

1 Scott A. Kronland (SBN 171693)
2 Stacey M. Leyton (SBN 203827)
3 Eileen B. Goldsmith (SBN 218029)
4 Danielle E. Leonard (SBN 218201)
5 Robin S. Tholin (SBN 344845)
6 James Baltzer (SBN 332232)
7 ALTSHULER BERZON LLP
8 177 Post Street, Suite 300
9 San Francisco, CA 94108
10 Tel. (415) 421-7151
11 Fax (415) 362-8064
12 skronland@altber.com
13 sleyton@altber.com
14 egoldsmith@altber.com
15 dleonard@altber.com
16 rtholin@altber.com
17 jbaltzer@altber.com

Attorneys for Plaintiffs

[Additional Counsel not listed]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO;
AMERICAN FEDERATION OF STATE
COUNTY AND MUNICIPAL EMPLOYEES,
AFL-CIO; et al.,

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**DECLARATION OF DON L.
NEUBACHER**

DECLARATION OF DON L. NEUBACHER

Don L. Neubacher hereby declares:

1. I am a Board Member of the Coalition to Protect America's National Parks. I was the Superintendent at Yosemite National Park between 2010 and 2016, and the Superintendent at Point Reyes National Seashore between 1995 and 2010. My 36-year career with the National Park Service also included appointments at Glacier Bay National Park and the Denver Service Center.

2. The Coalition to Protect America's National Parks ("Coalition") is a non-profit organization made up of over 3,400 members, all of whom are current, former, and retired employees and volunteers of the National Park Service. Together, they have accumulated over 50,000 years of experience caring for America's most valuable natural and cultural resources. The Coalition's goal is to support the preservation and protection of the National Park System and the mission-related programs of the National Park Service ("NPS") to ensure the survival of the park system for generations to come.

3. Our members and their families are regular and avid users of the National Park System who would be adversely affected by any degradation of the parks or the programs of the NPS to preserve and protect the parks and make them available to visitors.

4. Although I have not seen any official announcement from NPS, the news media reports that a mass termination of more than 1,000 NPS employees with probationary status is underway. The news media also reports that the terminations are already having an adverse effect on park visitors. Copies of recent media reports are attached to this declaration as Exhibit A and Exhibit B.

5. Based on my experience as a park Superintendent, the termination of so many NPS employees at once will have an immediate adverse impact on the parks and park visitors. For example, at Yosemite, the park will likely have to stop specific functions and close park areas. There is no way to accommodate current visitation levels without additional staff support during the upcoming peak season. When there was a partial government shutdown in 2018, visitors trashed scenic viewpoints, defecated outside locked restrooms and trampled sensitive ecological areas with their vehicles and dogs. The park receives annual visitation of over 4 million people. Similarly,

1 Point Reyes National Seashore receives about 2.3 million annual visitors and must be maintained and
2 protected by a full staff for the park to serve all these visitors.

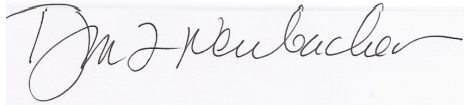
3 6. The hiring process for new NPS employees is a very thorough process. Employees on
4 probationary status have completed that process. The volume of the mass terminations of
5 probationary employees that have been reported by the media is unprecedented and cannot possibly
6 be based on the individual evaluation of all these employees or the performance of all these
7 employees. When I was Superintendent at Yosemite, there was a well-established process for
8 individual performance evaluations.

9 7. Terminated NPS employees who work at parks in more remote areas, like Yosemite
10 National Park, are likely to relocate to other geographic areas to look for new employment. If the
11 mass terminations are allowed to go forward, it is unlikely that the same individuals could be rehired
12 later. Indeed, many park employees live in park housing and would need to immediately move if
13 they lose their jobs.

14 8. The hiring of temporary, seasonal employees cannot make up for the loss of so many
15 permanent employees. The permanent employees have already been trained, often have different
16 skills, and plan to make their careers at NPS.

17 9. For these reasons, the mass termination of NPS employees will be catastrophic for the
18 park system and for the visitor experience.

19 I declare under penalty of perjury under the laws of the United States that the foregoing is true
20 and correct. Executed this 21st day of February 2025 in Point Reyes Station, California.

21 
22

23 _____
24 Don L. Neubacher
25
26
27
28

EXHIBIT A

<https://apnews.com/article/trump-national-park-firings-doge-grand-teton-baedee0a748a6374eafb6f95aac5dadcd>
(last visited Feb 21, 2025)

AP News

Politics

Trump's firing of 1,000 national park workers raises concerns about maintenance and operating hours

By [MATTHEW DALY](#)

Updated 12:43 PM PST, February 19, 2025

WASHINGTON (AP) — The Trump administration has fired about 1,000 newly hired National Park Service employees who maintain and clean parks, educate visitors and perform other functions as part of its broad-based effort to downsize government.

The firings, which weren't publicly announced but were confirmed by Democratic senators and House members, come amid what has been [a chaotic rollout](#) of an aggressive program to eliminate thousands of federal jobs. The plan is led by billionaire [Elon Musk](#) and the new Department of Government Efficiency, a Trump administration effort to slash federal spending. Adding to the confusion, the park service now says it is reinstating about 5,000 seasonal jobs that were initially rescinded last month as part of a [spending freeze](#) ordered by President Donald Trump.

Seasonal workers are routinely added during the warm-weather months to serve more than 325 million visitors who descend on the nation's 428 parks, historic sites and other attractions each year.

Park advocates say the permanent staff cuts will leave hundreds of national parks — including some of the most well-known and most heavily visited sites — understaffed and facing tough decisions about operating hours, public safety and resource protection.

"Fewer staff means shorter visitor center hours, delayed openings and closed campgrounds," said Kristen Brengel, senior vice president of government affairs at the National Parks Conservation Association, an advocacy group.

Trash will pile up, restrooms won't be cleaned, and maintenance problems will grow, she predicted. Guided tours will be cut back or canceled and, in the worst cases, public safety could be at risk.

The Trump administration's actions "are pushing an already overwhelmed Park Service to its breaking point," Brengel said. "And the consequences will be felt in our parks for years."

A spokesperson for the Interior Department, which oversees the park service, declined to comment Monday. A separate email to the park service received no answer.

Democrats on the House and Senate Appropriations Committees confirmed the firings as part of a larger list of terminations ordered by the Trump administration.

"There is nothing 'efficient' about indiscriminately firing thousands upon thousands of workers in red and blue states whose work is badly needed," said Sen. Patty Murray, D-Wash., vice chair of the Appropriations panel, who blamed both Trump and Musk.

"Two billionaires who have zero concept of what the federal workforce does are breaking the American government — decimating essential services and leaving all of us worse off," Murray said.

Among other cuts, 16 of 17 supervisory positions at Wyoming's Grand Teton National Park were eliminated, Brengel said, leaving just one person to hire, train and supervise dozens of seasonal employees expected this summer at the popular park where thousands of visitors marvel at grizzly bears and bison.

At Virginia's Shenandoah National Park, meanwhile, fee collectors and trail maintenance employees were laid off, potentially making trails at the popular park near Washington, D.C., unpassable after heavy rains.

"They're basically knee-capping the very people who need to train seasonal" employees who work as park rangers, maintenance staff and trail managers, Brengel said in an interview. "It puts the park in an untenable position. You're going to hurt tourism."

The firings may force small parks to close visitor centers and other facilities, while larger parks will have to function without cultural resources workers who help visitors interpret the park, fee collectors and even wastewater treatment operators, she said.

Stacy Ramsey, a ranger at the Buffalo National River in Arkansas, wrote on Facebook that she was fired on Friday. She had been a probationary employee in the first year of a four-year position funded by the 2022 Inflation Reduction Act, [the climate law signed by former President Joe Biden](#).

“Did those who made the decision know or care that the main objective of my position is to provide preventive search and rescue education, to keep park visitors safe?” she asked in a widely shared Facebook post.

Brian Gibbs, who had been an environmental educator at the Effigy Mounds National Monument in Iowa, was heartbroken after losing what he called his “dream job” on Friday.

“I am the defender of your public lands and waters,” Gibbs wrote on Facebook in another widely shared post. “I am the motivation to make it up the hill...the Band-Aid for a skinned knee” and “the lesson that showed your children that we live in a world of gifts — not commodities. That gratitude and reciprocity are the doorway to true abundance, not power, money or fear.”

A freeze on spending under a five-year-old law signed by Trump also jeopardizes national parks, Brengel and other advocates said. The Great American Outdoors Act, passed with bipartisan support in 2020 [and signed by Trump](#), authorizes \$6.5 billion over five years to maintain and improve national parks.

The program is crucial to whittling down a massive maintenance backlog at the parks and is frequently hailed as a success story by lawmakers from both parties. The freeze could slow road and bridge improvements at Yellowstone National Park, which is in the midst of a \$216 million project to improve safety, access and experience on park roads. The project is mostly funded by the [Great American Outdoors Act](#).

Democratic senators denounced the job cuts, saying in a letter before the mass firings were imposed that if a significant number of National Park Service workers take an early retirement package offered by Trump or are terminated from their positions, “park staffing will be in chaos. Not only does this threaten the full suite of visitor services, but could close entire parks altogether,” the senators wrote.

The letter was led by Sens. Jeff Merkley of Oregon and Angus King of Maine and signed by 20 other senators.

Gutting staff at national park units “will devastate local ‘gateway’ communities where parks generate significant economic activity – from hotels to restaurants to

stores to outfitters,” the senators wrote. Park visitors supported an estimated 415,000 jobs and \$55.6 billion in total economic activity in 2023, they said.

Ramsey wrote on Facebook that she assisted with at least 20 search-and-rescues on the Buffalo National River in Arkansas over the past five years. She said she worked as a river ranger, upper district fee collector, interpreter and even helped with concessions and maintenance during her time at the park.

The Buffalo, established as the first national river in the U.S. by Congress in 1972, flows freely through the Ozark Mountains of Arkansas for 135 miles of quiet pools, majestic bluffs and churning rapids. It is one of the few remaining undammed rivers in the lower 48 states.

Ramsey stayed in the river ranger job despite opportunities for more permanent positions, she said, “because I loved looking out for the safety of people on the river.”

“I truly loved my job,” she wrote. “The river is home to me.”

An earlier version of this story incorrectly referred to the Department of Government Efficiency as an outside-government organization. It is President Donald Trump’s special commission tasked with slashing federal spending and is part of the federal government.

MATTHEW DALY

Daly covers climate, environment and energy policy for The Associated Press. He is based in Washington, D.C.

EXHIBIT B

<https://www.msn.com/en-us/travel/news/long-lines-and-canceled-rentals-firings-bring-chaos-to-national-parks/ar-AA1zmNhk?ocid=BingNewsSerp>
(last visited Feb. 21, 2025)

The Washington Post

Long lines and canceled rentals: Firings bring chaos to national parks

Feb 19, 2025

Story by Maxine Joselow, Andrea Sachs

At California's Yosemite National Park, the Trump administration fired the only locksmith on staff on Friday. He was the sole employee with the keys and the institutional knowledge needed to rescue visitors from locked restrooms.

The wait to enter Arizona's Grand Canyon National Park this past weekend was twice as long as usual after the administration let go four employees who worked at the south entrance, where roughly 90 percent of the park's nearly 5 million annual visitors pass through.

And at Gettysburg National Military Park in Pennsylvania, last week's widespread layoffs gutted the team that managed reservations for renting historic farmhouses. Visitors received notifications that their reservations had been canceled indefinitely.

President Donald Trump's purge of federal employees is not only upending the lives of National Park Service workers, but also threatening to harm the visitor experience at national parks across the country. The problems are expected to escalate during the summer season, when more than 100 million Americans and international tourists typically visit the 63 national parks in the United States.

"It's chaos everywhere," said Kristin Jenn, a former seasonal park ranger at Alaska's Denali National Park and Preserve. "I don't know what the next couple of months are going to bring."

As part of a directive to fire most trial and probationary staff across the federal government, the Park Service on Friday terminated roughly 1,000 probationary employees, in what some are calling a "Valentine's Day massacre."

This account of how the firings are disrupting national parks is based on interviews and messages with more than a dozen current and former Park Service workers, as well as park advocates.

Asked for comment, a Park Service spokesperson said in an email, “The National Park Service is working closely with the Office of Personnel Management to ensure we are prioritizing fiscal responsibility for the American people. As always, NPS will continue to provide critical services and deliver excellent customer service.”

The layoffs have rippled across the government, affecting the federal response to everything from natural disasters to infectious-disease outbreaks. But some of their most tangible impacts could be felt in national parks, popular travel destinations that saw more than 325 million visits in 2023.

Nate Vince, Yosemite National Park’s fired locksmith, said he found out about his termination three weeks before the end of his probationary period. The 42-year-old said he worries about not only his career prospects, but also the safety and security of park visitors and workers.

Yosemite, which is roughly the size of Rhode Island, has hundreds of locked buildings and gates. Sometimes visitors get locked inside vault toilets or restrooms. Sometimes employees get locked out of their houses in the middle of the night.

“We have a federal court, administrative buildings, toilets, closets, gun safes,” said Vince, who started working as a permanent employee at the park in March after four years as a seasonal employee. “We have endless things that need to be secured in various forms, and I’m the sole keeper of those keys, the one that makes the keys, the one that fixes the locks, installs the locks, and has all that knowledge of the security behind the park. And so it’s a critical role. And without it, everyone else in the park is handicapped.”

The firings add to persistent staffing challenges at the Park Service, whose workforce has declined by 15 percent since 2010, according to federal data. Over that same period, the data shows, park visitation has increased by 16 percent.

“We saw 30,000 visits a day — that’s half the size of a Taylor Swift concert,” said Jeff Mow, who served as superintendent of Glacier National Park from 2013 to 2022. “How are you going to manage that with a skeleton staff?”

Bill Wade, a former superintendent of Shenandoah National Park who serves as executive director of the Association of National Park Rangers, said the fired staffers’ absence will be felt throughout the parks. At the entrances, where they collected admission fees and doled out maps and warm welcomes. At the visitor centers, where they recommended adventures based on hikers’ interests and endurance levels. On the trails, where they led walks, blending an encyclopedic knowledge of history and ecology with engaging yarns. And even in the restrooms,

where they tidied up the facilities, emptying the trash and restocking the toilet paper.

The firings, Wade and others said, could cause disruptions reminiscent of the coronavirus pandemic and recent government shutdowns. Visitor centers and campgrounds could close or reduce their hours. Garbage could spill out of overfilled bins. Litter could sully nature trails.

“Some of the effects could be immediate, but the bulk of the impacts will occur in the heavy season, which for many national parks is May to September,” said Wade, who worked for the Park Service for more than three decades.

At least one park, however, has seen immediate impacts. During Presidents’ Day weekend, lines of cars waited at the southern entrance to Grand Canyon National Park for an hour and a half, said Jim Landahl, a fired probationary worker there.

“That’s double the typical time it takes to get into the park,” he said. “And that’s directly because we were understaffed because four of the rangers who work at the entrance received termination notices.”

Several other fired employees at the Grand Canyon were working to replace a 12.5-mile pipeline that provides water for all facilities on the park’s South Rim, including some shower and laundry facilities, Landahl said. The pipeline was built in the 1960s and “experiences frequent failures,” according to the park’s website, with more than 85 major breaks since 2010.

Despite its name, the Park Service also manages 87 national monuments across the country. Some probationary employees at national monuments were also fired Friday, although the total number is unclear.

Brian Gibbs, 41, who was working as a ranger at Effigy Mounds National Monument in northeast Iowa, said his termination was “traumatic” and “absolutely upended” his life. He said his wife, who is pregnant with their second child, will be kicked off his health insurance next week, raising the cost of her regular OB/GYN appointments.

Besides the effects on his family, Gibbs said, he worries about the effects on the local students he had been teaching and hosting on field trips at Effigy Mounds, which is home to more than 200 Native American ceremonial and burial mounds. At the time of his firing, he had been helping to teach elementary and middle school science students about the importance of protecting public lands and the natural world.

“Public lands are places where we can all come together and learn about past and present cultures,” Gibbs said. “They are one of our greatest gifts.”